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of the American Reported Decisions. They Standing of are divided into four classes, A, B, C and D. State Reports. A stands for very high and D for very low. B and C and "middling." Under A are placed all the Federal Reports, both Supreme and Circuit, all the reports of Massachusetts and Pennsylvania, and all the reports of New York, except Anthon. Under "D" (a sort of index expurgatorius, for the English Bar, we suppose), no fewer than nineteen reporters have the misfortune (in several cases quite well deserved) to figure. Kentucky and Tennessee lead the procession, Bibb, Hardin, A. K. and J. J. Marshall, Monroe, Peck, Martin and Yerger, Humphrey, Cooke and Yerger all appearing. Ohio appears twice (Wright and Hammond), and Alabama (Porter), North Carolina (Martin), Connecticut (Kirby), Maryland (Harris & McHenry), Indiana (Blackford), Virginia (Va. Cas.), and New York (Anthon), each one. All the rest of the reports and reporters are rated "B" and "C,"-fair and middling.

NOTES OF CASES.

State—Suits against.—A suit against a state officer to cancel a tax title is held in Sanders v. Saxton (N. Y.) 1 L. R. A. (N. S.) 727, to be within the rule that a state cannot be sued.

Municipal Corporations—Water Companies—Consumer's Right.—A consumer's right to maintain a suit to compel a water company to furnish water at rates stipulated in a contract with municipality is upheld in Pond v. New Rochelle Water Co. (N. Y.) 1 L. R. A. (N. S.) 958.

Adverse Possession—What Constitutes.—Inclosure of a right of way is held in Pritchard v. Lewis (Wis.) 1 L. R. A. (N. S.) 565, not to be sufficient possession to ripen into an adverse title.

A grantee from a mortgagor, who takes possession of a strip beyond the true boundary line, is held in Thornely v. Andrews (Wash.) 1 L. R. A. (N. S.) 1036, not to be in adverse possession as against the mortgagee until the mortgage becomes due.

Criminal Law—Questions by Jurymen.—The failure of the court, in a criminal case, to interpose objections to improper questions made